



U.S. Department of Justice

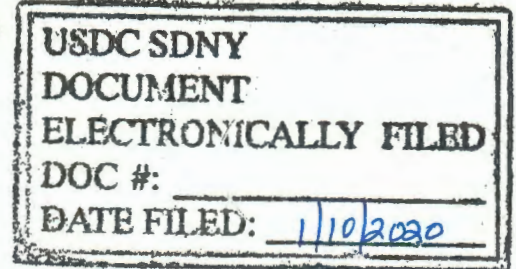
United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

January 9, 2020

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007



Re: *United States v. Muhammad Waqar*, 18 Cr. 342 (SHS)

Dear Judge Stein:

**MEMO ENDORSED**

As the Court is aware, before the start of trial in the above-captioned case, the Court directed defense counsel to make an ex parte proffer regarding the entrapment defense that counsel was contemplating advancing. Although this proffer was sealed to the Government for the duration of trial, the Government understands that the remarks were to be made part of the public record following the jury's verdict. Furthermore, based on the defendant's renewed request for bail pending appeal, it appears that the defense decision not to pursue an entrapment defense at trial may be an issue on appeal. (See Dkt. No. 89 at 21-23.) As a result, the Government respectfully requests that the Court unseal the currently sealed portion of the trial transcript dated September 9, 2019.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by: Daniel Nessim  
Daniel G. Nessim  
Assistant United States Attorney  
(212) 637-2486

SO ORDERED 1/10/2020

SIDNEY H. STEIN  
U.S.D.J.